



Commonwealth of Virginia
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE
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Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director
(804) 698-4000

James J. Golden
Regional Director

October 15, 2019

Mr. W. Scott Bridgforth
President
Virginia Marble Manufacturers Inc.
P.O. Box 766
Kenbridge, VA 23944

Location: Lunenburg County
Registration No.: 30743

Dear Mr. Bridgforth:

Attached is a renewal Title V permit to operate your facility pursuant to 9VAC5 Chapter 80 Article 1 of the Virginia Regulations for the Control and Abatement of Air Pollution. The attached permit will be in effect beginning October 15, 2019.

In the course of evaluating the application and arriving at a final decision to issue this permit, the Department of Environmental Quality (DEQ) deemed the application complete on September 27, 2018 and solicited written public comments by placing a newspaper advertisement in the Kenbridge-Victoria Dispatch on August 28, 2019. The thirty-day required comment period, provided for in 9VAC5-80-270 expired on September 27, 2019.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

This permit approval to operate shall not relieve Virginia Marble Manufacturers, Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board

within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact the regional office at (804) 527-5020.

Sincerely,



Kyle Ivar Winter, P.E.
Deputy Regional Director

KIW/AMS/30743_09_2019 TV renewal.docx

Attachments: Permit

cc: Air Inspector, DEQ
EPA Region 3, Air Permitting Division
File



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Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Virginia Marble Manufacturers, Inc.
Facility Name: Virginia Marble Manufacturers, Inc. - Plant 1
Facility Location: 1201 Fifth Avenue, Kenbridge, Virginia
Registration Number: 30743
Permit Number: PRO-30743

This permit includes the following programs: Federally Enforceable Requirements - Clean Air Act

October 15, 2019
Effective Date

October 14, 2024
Expiration Date

Kyle Ivar Winter, P.E.
Deputy Regional Director

October 15, 2019
Signature Date

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Facility Information

Permittee

Virginia Marble Manufacturers, Inc.

P.O. Box 766

Kenbridge, VA 23944

Responsible Official

W. Scott Bridgforth

President

Facility

Virginia Marble Manufacturers, Inc. – Plant #1

1201 Fifth Avenue

Kenbridge, VA 23944

Contact Person

Tim Lovell

Manager – Facilities, Environmental, Health, and Safety

(434) 676-3204

County-Plant Identification Number: 51-111-00016

Facility Description: NAICS 326191 - Plastics Plumbing Fixture Manufacturing. The facility manufactures cultured marble products including sinks and tubs. Molds are created and repaired on site. Marble dust and resins are mixed using automatic and manual methods and poured into molds to be dried. The mold pouring process is performed in one of three casting lines denoted as custom line, tub line, and standard line. Cured molds are removed from the cast and grinded and/or sanded in four booths controlled by fabric filters. A gel coat is applied by hand roller or spray gun. Coating applications are performed in spray booths controlled by filters. Final products are packed and stored for shipping. Two 4,400-gallon stationary tankers are on site.

Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
1C, 2C, and 3C	V1, V2, V12, and V13	Three Casting lines (material mixed and poured in molds)(includes one automatic)	Total 4,029 lb/hr of finished product	None	--	--	April 1, 2003
SB1, SB2, SB3, SB4, SB6, and SB7	V1, V2, V12, V13, V19, and V20	Spray/brush gel coat	--	Double fiberglass filters: L.H.Wingfield (SB1-4) JBI #IDB-127 (SB6); Daniel Brothers (SB7)	SB1, SB2, SB3, SB4, SB6, and SB7	PM and PM10	April 1, 2003
1GS, 2GS, 3GS, and 4GS	V15, V16, V17, and V18	Four Sanding and grinding booths for removal of rough edges from castings	--	Gruber 6-105-96 fabric filter	1GS, 2GS, 3GS, and 4GS	PM and PM10	April 1, 2003
SB5 and mold making and repairing area	V14	Mold making and repairing	--	L .H. Wingfield	V14	PM and PM10	April 1, 2003
T1 and T2	none	Two polyester resin storage tankers	4,400 gallons of resin (each)	None	N/A	N/A	April 1, 2003
MC	none	Mold cleanup	--	None	--	--	April 1, 2003
B1	None	Buderus #2 oil-fired boiler	2.31 MMBtu/hr	None	N/A	N/A	None
B2	None	Peerless #2 oil-fired boiler	1.36 MMBtu/hr	None	N/A	N/A	None

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

Fuel Burning Equipment Requirements (B1 and B2) Limitations

1. **Fuel Burning Equipment Requirements – Limitations** – No owner or other person shall cause or permit to be discharged into the atmosphere from any fuel burning equipment installation any gaseous products of combustion containing particulate matter in excess of the following limit: for fuel burning equipment with a total capacity less than 10 million Btu per hour (B1 and B2), the maximum allowable emission ratio shall be 0.6 pounds of particulate matter per million Btu input. Compliance with these limits shall be determined by compliance with Condition 6.
(9 VAC 5-80-110 and 9 VAC 5-40-900.A.1.a)
2. **Fuel Burning Equipment Requirements – Limitations** – The maximum allowable particulate matter emissions for each fuel burning equipment unit (B1 and B2), in pounds per hour, shall be the product of the rated capacity (in million Btu per hour) and the emission ratio in Condition 1 above (in pounds per million Btu input). Compliance with these limits shall be determined by compliance with Condition 6.
(9 VAC 5-80-110 and 9 VAC 5-40-900.B.1)
3. **Fuel Burning Equipment Requirements – Limitations** – No owner or other person shall cause or permit to be discharged into the atmosphere from any fuel burning equipment installation (B1 and B2) any sulfur dioxide emissions in excess of the following limit in pounds per hour: 2.64 pounds per million Btu x heat input at total capacity expressed in million Btu per hour. Compliance with these limits shall be determined by demonstrating that the fuel sulfur content of the distillate oil fired in the boilers (B1 and B2) is less than or equal to 0.5 percent sulfur by weight through fuel supplier certifications.
(9 VAC 5-80-110 and 9 VAC 5-40-930A.1)
4. **Fuel Burning Equipment Requirements – Fuel Certification** - The permittee shall obtain a certification from the fuel supplier, once a month, with a shipment of distillate oil. Each fuel supplier certification shall include the following:
 - a. The name of the fuel supplier;
 - b. The date on which the distillate oil was received;
 - c. The sulfur content of the distillate oil;

Fuel sampling and analysis, independent of that used for certification, as may be periodically required or conducted by DEQ may be used to determine compliance with the fuel specifications stipulated in Condition 3. Exceedance of these specifications may be considered credible evidence of the exceedance of emission limits.

(9 VAC 5-80-110)

5. **Fuel Burning Equipment Requirements – Limitations** – Visible Emissions from the fuel burning equipment (B1 and B2) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, App. A). Compliance with these limits shall be determined monthly using compliance and monitoring methods found in Condition 6.
(9 VAC 5-80-110 and 9 VAC 5-50-80)

Monitoring

6. **Fuel Burning Equipment Requirements – Monitoring** - At least one time per month an observation for the presence of visible emissions from each boiler stack (B1 and B2) shall be made if that boiler is operated that month. If visible emissions are observed the permittee shall:
- Take timely corrective action and re-conduct the observation for the presence of visible emissions to ensure that the boiler has resumed operation with no visible emissions, or
 - Conduct a visible emission evaluation (VEE) in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six minutes, to assure visible emissions from each of the boiler stacks (B1 and B2) is less than or equal to 20 percent opacity. If any of the 15-second observations exceeds 20 percent opacity, the observation period shall continue until a total of 60 minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the affected boiler resumes operation in compliance with Condition 5.

The permittee shall maintain a boiler observation log to demonstrate compliance. The log shall include the date and time of the observations, name of the observer, whether or not there were visible emissions, any VEE recordings and any necessary corrective action. If a boiler has not been operated during the month, it shall be noted in the log that a visual observation was not required.

(9 VAC 5-80-110)

7. **Fuel Burning Equipment Requirements – Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:
- All monthly fuel supplier certifications.
 - The results of monthly visible emission surveys as detailed and required by Condition 6 and details of any corrective action(s) taken as a result of these inspections.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent (5) years.

(9 VAC 5-80-110 and 9 VAC 5-50-50)

40CFR 63 MACT DDDDD – Boiler Requirements (B1)

8. **Fuel Burning Equipment Requirements – 40 CFR 63 Subpart DDDDD** – Continuing Compliance - the owner/operator of the B1 Buderus boiler (existing oil-fired unit >1.6 million Btu/hr and <5 million Btu/hr) must conduct a tune-up on that unit (B1) once every five years using the procedures in 40 CFR 63.7540(a)(10)(i) through (vi). Records of tune-up events shall be kept as per 40 CFR 63.7555(a)(1) and (2).
(9 VAC 5-80-110, 40 CFR 63.7500(d), and 40 CFR 63.7540(a)(12))

40CFR 63 MACT WWWW - Reinforced Plastic Composites Requirements

9. **MACT WWWW** – The permittee shall meet the organic HAP emissions limits in Table 3 of 40CFR 63 Subpart WWWW.
(9 VAC 5-80-110, 9 VAC-60-100, and 40CFR 63.5805)
10. **MACT WWWW** – The permittee shall meet the work practice standards in Table 4 of 40CFR 63 Subpart WWWW.
(9 VAC 5-80-110, 9 VAC-60-100, and 40CFR 63.5805)
11. **MACT WWWW** – The permittee shall meet the standards by using one of the following methods in 40CFR 63 Subpart WWWW:
 - a. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emissions standard in Table 3 or 5 of 40CFR 63 Subpart WWWW,
 - b. Demonstrate that, on average, you meet the individual organic HAP emissions limits for each combination of operation type and resin application and gel coat type of 40CFR 63 Subpart WWWW,
 - c. Demonstrate compliance with the weighted average emission limit, or
 - d. Meet the organic HAP emission limit for one application method and use the same resin(s) for all application methods of that resin type.
(9 VAC 5-80-110, 9 VAC-60-100, and 40CFR 63.5810)
12. **MACT WWWW** – The permittee shall meet the general requirements as required in 40CFR 63.5835.
(9 VAC 5-80-110, 9 VAC-60-100, and 40CFR 63.5835)

13. **MACT WWW** – The permittee shall demonstrate continuous compliance with the standards by meeting the requirements as required in 40CFR 63.5900.
(9 VAC 5-80-110, 9 VAC-60-100, and 40CFR 63.5900)
14. **MACT WWW** – The permittee shall submit notifications and reports in accordance with 40CFR 63.5905 and 40CFR 63.5910.
(9 VAC 5-80-110, 9 VAC-60-100, 40CFR63.5905, and 40CFR 63.5910)
15. **MACT WWW** – The permittee shall maintain records required in 40CFR 63.5915.
(9 VAC 5-80-110, 9 VAC-60-100, and 40CFR 63.5915)
16. **MACT WWW** – The permittee shall comply with the general provisions of 40CFR 63 Subpart A as specified in 40CFR 63.5925.
(9 VAC 5-80-110, 9 VAC-60-100, and 40CFR 63.5925)

Process Equipment Requirements (1C, 2C, and 3C, 1GS-4GS, SB1-SB7, T1 & T2, and MC)
Limitations

17. **Process Equipment Requirements - (1GS, 2GS, 3GS, 4GS) - Limitations** - Particulate emissions from the sanding and grinding operations (1GS, 2GS, 3GS, 4GS) shall be controlled by fabric filters. The fabric filters shall be provided with adequate access for inspection and shall be in operation when the sanding and grinding processes are operating.
(9 VAC 5-80-110 and Condition 3 of 4/1/2003 Permit)
18. **Process Equipment Requirements - Limitations** - Fugitive particulate emissions from the collection, transfer and handling of sanding and grinding dust shall be controlled by a completely enclosed transfer system.
(9 VAC 5-80-110 and Condition 4 of 4/1/2003 Permit)
19. **Process Equipment Requirements - Limitations** - Fugitive particulate emissions from the collection, transfer and handling of collected cultured marble dust shall be controlled by complete enclosure.
(9 VAC 5-80-110 and Condition 5 of 4/1/2003 Permit)
20. **Process Equipment Requirements - (SB1 – SB7) - Limitations** - Particulate emissions from the spray booths (SB1 – SB7) shall be controlled by replaceable filters. The spray booths shall be provided with adequate access for inspection and shall be in operation when gel coating is being performed.
(9 VAC 5-80-110 and Condition 6 of 4/1/2003 Permit)

21. **Process Equipment Requirements - (1C, 2C, and 3C) - Limitations** - The throughput of casting resin shall not exceed 2,497.8 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 8 of 4/1/2003 Permit)
22. **Process Equipment Requirements - (SB1, SB2, SB3, SB4, SB6, and SB7) - Limitations** - The throughput of gel coat resin shall not exceed 249.8 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 9 of 4/1/2003 Permit)
23. **Process Equipment Requirements - (SB5) - Limitations** - The throughput of mold making casting resin shall not exceed 19.2 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 10 of 4/1/2003 Permit)
24. **Process Equipment Requirements - (SB5) - Limitations** - The throughput of mold making gel coat resin shall not exceed 5.6 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 11 of 4/1/2003 Permit)
25. **Process Equipment Requirements - (1GS, 2GS, 3GS, and 4GS) - Limitations** - Emissions from the operation of the sanding and grinding process shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf
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PM-10	0.01 gr/dscf
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(9 VAC 5-80-110 and Condition 12 of 4/1/2003 Permit)

26. **Process Equipment Requirements - (SB1, SB2, SB3, SB4, SB6, SB7) - Limitations** - Emissions from the operation of the gel coat spray booths (SB1,SB2, SB3, SB4, SB6, SB7) shall not exceed the limits specified below:

Particulate Matter	5.0 lb/hr	6.9 ton/yr
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PM-10	5.0 lb/hr	6.9 ton/yr
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Volatile Organic Compounds	34.8 lb/hr	69.5 ton/yr
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Styrene	25.4 lb/hr	50.8 ton/yr
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Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period. These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible

evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 22 and 36.
(9 VAC 5-80-110 and Condition 13 of 4/1/2003 Permit)

27. **Process Equipment Requirements - (1C, 2C, 3C, T1 and T2) - Limitations -** Emissions from the operation of the casting process and resin storage shall not exceed the limits specified below:

Volatile Organic Compounds	9.2 lb/hr	17.6 ton/yr
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Styrene	9.2 lb/hr	17.6 ton/yr
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Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period. These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 21 and **Error! Reference source not found.** below.

(9 VAC 5-80-110 and Condition 14 of 4/1/2003 Permit)

28. **Process Equipment Requirements - (SB5) - Limitations -** Emissions from the operation of the mold making and repairing process shall not exceed the limits specified below:

Volatile Organic Compounds	4.0 lb/hr	7.4 ton/yr
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Styrene	4.0 lb/hr	7.4 ton/yr
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Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period. These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 23, 24, and **Error! Reference source not found..**

(9 VAC 5-80-110 and Condition 15 of 4/1/2003 Permit)

29. **Process Equipment Requirements - Limitations -** Emissions from the cleaning operation shall not exceed the limits specified below:

Volatile Organic Compounds	1.4 lb/hr	2.8 ton/yr
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Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

(9 VAC 5-80-110 and Condition 16 of 4/1/2003 Permit)

30. **Process Equipment Requirements - (SB1, SB2, SB3, SB4, SB6, and SB7) - Limitations** - Visible emissions from the spray booths shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-110 and Condition 17 of 4/1/2003 Permit)
31. **Process Equipment Requirements - (1GS, 2GS, 3GS, 4GS) - Limitations** - Visible emissions from the fabric filter on the sanding and grinding processes (1GS, 2GS, 3GS, 4GS) shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-110 and Condition 18 of 4/1/2003 Permit)

Monitoring

32. **Process Equipment Requirements - (1GS, 2GS, 3GS, 4GS) - Monitoring** - The fabric filters on the sanding and grinding processes (1GS, 2GS, 3GS, 4GS) shall be equipped with devices to continuously measure the differential pressure drop across the fabric filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures that shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the sanding and grinding processes are operating.
(9 VAC 5-80-110 and Condition 7 of 4/1/2003 Permit)
33. **Process Equipment Requirements – (1GS, 2GS, 3GS, 4GS) – Monitoring** - The permittee shall establish a normal operating range for the differential pressure drop across each of the fabric filters, based on manufacturer's recommendations or developed from observations recorded from the monitoring devices during normal operation. The permittee shall maintain written documentation of this range.
(9 VAC 5-80-110 E)
34. **Process Equipment Requirements - (V1, V2, V12, V13, V14, V19, V20 V15, V16, V17, and V18) - Monitoring** - At least one time per day an observation of the presence of visible emissions from the spray booth exhaust (V1, V2, V12, V13, V14, V19, and V20) and sanding and grinding exhaust (V15, V16, V17, and V18) stacks shall be made, while. The presence of visible emissions shall require the permittee to:
- Take timely corrective action such that the unit, with visible emissions, resumes operation with no visible emissions, or,
 - Conduct a visible emission evaluation (VEE) on the spray booth exhaust (V1, V2, V12, V13, V14, V19, and V20) or sanding and grinding exhaust (V15, V16, V17, and V18) stack, with visible emissions, in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six minutes, to assure visible emissions from the spray booth exhaust (V1, V2, V12, V13, V14, V19, and V20) and sanding and grinding exhaust (V15, V16, V17, and V18) stacks are

5 percent opacity or less. If any of the observations exceeds 5 percent opacity, the observation period shall continue until a total of sixty minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the spray booths exhaust (V1, V2, V12, V13, V14, V19, and V20) and sanding and grinding exhaust (V15, V16, V17, and V18) booths resume operation within the 5 percent opacity limit.

(9 VAC 5-80-110 E)

35. **Process Equipment Requirements - (V1, V2, V12, V13, V14, V19, V20, V15, V16, V17, and V18) - Monitoring** - The permittee shall maintain a spray booth exhaust (V1, V2, V12, V13, V14, V19, and V20) and sanding and grinding exhaust (V15, V16, V17, and V18) stack observation log to demonstrate compliance. The logs shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the spray booth exhaust (V1, V2, V12, V13, V14, V19, and V20) and sanding and grinding exhaust (V15, V16, V17, and V18) booths have not been operated for any period during the day it shall be noted in the log book.

(9 VAC 5-80-110 E and 9 VAC 5-80-110K)

Recordkeeping

36. **Process Equipment Requirements - Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:
- a. Annual consumption of cleaning solvent, calculated monthly as the sum of each consecutive 12-month period.
 - b. Annual throughput of casting resin, calculated monthly as the sum of each consecutive 12-month period.
 - c. Annual throughput of gel coat resin, calculated monthly as the sum of each consecutive 12-month period.
 - d. Annual throughput of mold making resin and mold making gel coat resin, calculated monthly as the sum of each consecutive 12-month period.
 - e. A monthly and annual material balance including the throughput and emissions of VOC, styrene, and methyl methacrylate. Annual throughputs shall be calculated monthly as the sum of each consecutive 12-month period.
 - f. Normal operating range values for the fabric filters as required by Condition 33

- g. Results of visible emissions observations required by Condition 35, and any corrective action taken as required by Condition 34.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9 VAC 5-50-50, and Condition 19 of 4/1/2003 Permit)

Facility Wide Conditions

- 37. **Facility Wide Conditions - Testing** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(VAC 5-80-110 and Condition 20 of 4/1/2003 Permit)
- 38. **Facility Wide Conditions - Limitations** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-80-110 and Condition 23 of 04/1/2003 Permit)
- 39. **Facility Wide Conditions - Limitations** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.

(9 VAC 5-80-110 and Condition 24 of 04/1/2003 Permit)

Insignificant Emission Units

40. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720B)	Rated Capacity (9 VAC 5-80-720C)
None	None	None	None	None

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Permit Shield & Inapplicable Requirements

41. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR Subpart JJJJJ	National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	This regulation applies to boilers located at an area source of HAP. VMM is a major source of HAP.
NSPS Subpart D	New Source Performance Standards for Fossil Fuel-fired Steam Generating units	This regulation applies to boilers that are greater than 250 MMBtu/hr capacity.
NSPS Subpart Da	New Source Performance Standards for Electric Utility Steam Generating units	This regulation applies to boilers that generate electricity.
NSPS Subpart Db	New Source Performance Standards for Industrial, Commercial, Institutional Steam Generating Units	This regulation applies to boilers that are greater than 100 MMBtu/hr capacity.
NSPS Subpart Dc	New Source Performance Standards for Small Industrial, Commercial, Institutional Steam Generating Units	This regulation applies to boilers between 10 and 100 MMBtu/hr capacity.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of

the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

General Conditions

42. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110)
43. **General Conditions - Permit Expiration**
- a. This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
 - b. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
 - c. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
 - d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
 - e. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
 - f. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline

specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)

44. **General Conditions -Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
- a. The date, place as defined in the permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- (9 VAC 5-80-110)
45. **General Conditions -Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
- (9 VAC 5-80-110)
46. **General Conditions -Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
 - b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - i. Exceedance of emissions limitations or operational restrictions;
 - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,

iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110)

47. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address: R3_APD_Permits@epa.gov

(9 VAC 5-80-110)

48. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Piedmont Regional Office within four daytime business hours after discovery of any

deviations from permit requirements that may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 46 of this permit. (9 VAC 5-80-110 F.2)

49. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Piedmont Regional Office of such failure or malfunction and shall within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Piedmont Regional Office. (9 VAC 5-80-110 and 9 VAC 5-20-180)
50. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit. (9 VAC 5-80-110)
51. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application. (9 VAC 5-80-110)
52. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (9 VAC 5-80-110)
53. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-110, 9 VAC 5-80-190 and 9 VAC 5-80-260)

54. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110)
55. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110)
56. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110)
57. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350 in addition to an annual permit maintenance fee consistent with the requirements of 9 VAC 5-80-2310 through 9 VAC 5-80-2350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. The amount of the annual permit maintenance fee shall be the largest applicable base permit maintenance fee amount from Table 8-11A in 9 VAC 5-80-2340, adjusted annually by the change in the Consumer Price Index.
(9 VAC 5-80-110, 9 VAC 5-80-340 and 9 VAC 5-80-2340)
58. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
 - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
 - e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.
(9 VAC 5-80-110 and 9 VAC 5-40-90)
59. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-80-110 and 9 VAC 5-40-20 E)
60. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110)
61. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
 - d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
(9 VAC 5-80-110)
62. **General Conditions - Reopening For Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F. The conditions for reopening a permit are as follows:
- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
 - c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.
(9 VAC 5-80-110)
63. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-110 and 9 VAC 5-80-150)
64. **General Conditions - Transfer of Permits –**
- a. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
 - b. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

- c. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-110 and 9 VAC 5-80-160)
65. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-110, 9 VAC 5-80-190 C and 9 VAC 5-80-260)
66. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-110 and 9 VAC 5-80-80 E)
67. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(9 VAC 5-80-110 and 40 CFR Part 82)
68. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110)
69. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(9 VAC 5-80-110 and 40 CFR Part 68)

70. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110)
71. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
 - b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
 - c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
(9 VAC 5-80-110)